UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SUZANNE CRUISE CREATIVE SERVICES, INC., a Kansas corporation, and LAURIE COOK, an individual, Plaintiffs, -v- BARRINGTON STUDIOS LTD, a New Hampshire corporation, ANTHONY SPERANDEO, an individual, GEORGE LENCSAK, an individual, SHOPKO STORES OPERATING CO., LLC, a Delaware Limited Liability Company, FRED MEYER STORES, INC., a Delaware corporation, WAL-MART STORES, INC., a Delaware corporation, CVS CAREMARK CORPORATION, a Delaware corporation, DOLLAR GENERAL CORPORATION, a Tennessee corporation, DOLLAR TREE, INC., a Virginia corporation, BIG LOTS, INC., a Delaware corporation, and Does 1-20, Defendants.	CIVIL ACTION Index No: 10-cv-4293 (PKC) **ECF Filed**

DECLARATION OF KRISTINA M. MENTONE, ESQ.

I, Kristina M. Mentone, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an associate at the firm of Reed Smith LLP, attorneys for Defendant George Lencsak in this matter. As such, I am personally familiar with the matters set forth herein. I submit this Declaration in support of Defendant Lencsak's Motion to Dismiss claims against him in Plaintiffs' Amended Complaint.

2. Attached as Exhibit 1 is a true and correct copy of the September 13, 2010 letter to the Court detailing this motion in a pre-motion conference letter pursuant to section 2(A)(1) of this Court's Individual Practices.

3. Attached as Exhibit 2 is a true and correct copy the transcript of the November 30, 2010 deposition of Defendant George Lencsak, taken pursuant to the Court's Civil Case Management Plan and Scheduling Order (Dkt. Nos. 17 and 21).

DATED this the 26th day of January, 2011.

_____s/ Kristina Mentone____________
Kristina M. Mentone